

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 1:21-CR-38
v.	§	Judge Marcia A. Crone
	§	
STEPHEN JOHN PIEPER	§	

ELEMENTS OF THE OFFENSE

The defendant, **Stephen John Pieper (Pieper)**, is charged in Counts 1, 2 and 3 of the Indictment with violating 18 U.S.C. §§ 2251(a) and (e) (Sexual Exploitation of Children a/k/a Production of Child Pornography). The elements of the offense that the government must prove beyond a reasonable doubt, but that **Pieper** would admit if his plea is accepted, are:

1. The defendant employed, used, persuaded, induced, enticed, or coerced, a minor to engage in sexually explicit conduct;
2. The defendant acted with the purpose of producing a visual depiction of such conduct; and
3. The visual depiction was transported or transmitted using any means and facility of interstate or foreign commerce, or in or affecting interstate and foreign commerce; the visual depiction was produced or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate and foreign commerce by any means, including by computer; or the defendant knew or had reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate and foreign commerce, or in or affecting interstate and foreign commerce.

Respectfully submitted,

BRIT FEATHERSTON
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/s/ Rachel L. Grove

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served by electronic filing to opposing counsel on December 7, 2021.

/s/ Rachel L. Grove

Rachel L. Grove